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January 26, 2017

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Re: DOJ No. 90-5-2-1-09611 – Semi-annual Report for July 1, 2016 through December 31, 2016

To Whom It May Concern:

AdvanSix Resins & Chemicals LLC (“AdvanSix”, formerly Honeywell Resins & Chemicals LLC) is making this submittal pursuant to the Consent Decree in United States of America and Commonwealth of Virginia v. Honeywell Resins & Chemicals LLC (“consent decree”), the reference for which is Civil Action Number: 3:13-cv-00193-REP, and DOJ Case Number: 90-5-2-1-09611.

Paragraph 49 of the consent decree directs AdvanSix to submit a semi-annual report with a status of compliance measures identified in Sections V – XIII of the consent decree. Attachment A contains the semi-annual consent decree report.

If further information is required, please contact me at (804) 541-5119 or by email at Phillip.Sparks@Advan6.com.

Regards,



Phillip Sparks
Sr. Environmental Engineer

DOCUMENT CERTIFICATION

Facility Name: AdvanSix Resins & Chemicals LLC

Facility Location: 905 East Randolph Road, Hopewell, VA 23860

Type of Submittal Attached: Consent Decree Semi-annual Report for July 1, 2016 through December 31, 2016

Consent Decree Certification: I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name of Authorized Official: *Frederick P. Harry*

Title: *Site Manager*

Signature: *Frederick P. Harry* **Date:** January 26, 2017

Attachment A

Semi-annual Report for July 1, 2016 through December 31, 2016

1. Status of Compliance with Sections V – XIII

Provision	Status
Section V – Area 9 NOx Emission Reductions, Control and Testing	
12. Installation and Operation of first set of NOx Emission Controls (B-Train)	Installation is complete. System is in continuous operation.
13. Installation and Operation of second set of NOx Emission Controls (C-Train)	Installation is complete. System is in continuous operation.
14. Installation and Operation of third set of NOx Emission Controls (A-Train)	The SCR system installation was completed in November 2016. System is being operated and is scheduled to be in continuous operation by the 6/30/2017 due date.
15. Installation and Operation of fourth set of NOx Emission Controls (E-Train)	Construction on the E-Train SCR system is expected to start in Q1 2017. Due 12/31/2018 (installation), 6/30/2019 (operation).
16. Continuous operation of SCRs, within prescribed limits and methods	For installed NOx Emission Controls (B, C-Trains), the site has operated the systems within the requirements of the consent decree.
17. Conduct initial performance test on SCRs and report results	For installed SCRs (B, C-Trains), the site has conducted and submitted performance results. The initial performance test for the A-Train SCR system has been scheduled for Q1 2017 and will be completed within 180 days of the date the SCR system commences operation.
Section VI – Area 9 CEMS Installation and Operation	
18. Replace the existing EMCAMS with the installation / operation of NOx CEMs as installed	The site has replaced EMCAMS where it has installed CEMS (B, C-Trains). The A-Train EMCAMS will be replaced with CEMs as part of the SCR commissioning.
19. Install, certify, calibrate, maintain and operate NOx CEMs for B-Train	Installation is complete. System is in continuous operation.
19. Install, certify, calibrate, maintain and operate NOx CEMs for C-Train	Installation is complete. System is in continuous operation.
19. Install, certify, calibrate, maintain and operate NOx CEMs for A-Train	The A-Train NOx CEMs installation was completed in November 2016. System is being operated and is scheduled to be in continuous operation by the 6/30/2017 due date.
19. Install, certify, calibrate, maintain and operate NOx CEMs for E-Train	The E-Train NOx CEMs will be installed as part of the E-Train SCR project and will be installed and commissioned by 6/30/2019.
20. Conduct Relative Accuracy Test Audits (RATAs) and Compressed Gas Audits (CGAs)	For the installed NOx CEMS, the site has conducted and submitted RATAs and quarterly CGAs.

Section VII – Area 9 PM and Opacity Testing and Monitoring	
21. Conduct particulate matter and opacity performance testing and submit testing report	PM and opacity testing has been completed on the A, B, C, D and E- Trains and the results submitted.
Section VIII – Enhanced Leak Detection and Repair	
22. Implement and comply with the enhanced leak detection and repair plan (ELP)	The site has implemented the enhanced leak detection and repair plan.
Section IX – Benzene Waste NESHAP Audit	
23. Complete consent decree measures for BWON audit	The site has completed the BWON audit requirements of Section IX.
24. Submit audit statement of work	Statement of work was submitted and approved.
25. Enter into contract with third party to conduct BWON audit	Under a contract established with Sage Environmental Consulting, the site had the BWON audit completed.
26. Submit third party audit report	The site submitted the BWON audit report to the VADEQ and EPA.
27. Actions if site's TAB is over 10 Mg/yr	The BWON audit determined the site's TAB to be well less than 10 Mg/yr.
Section X – Miscellaneous Operations and Maintenance Measures	
28. Submit control and monitoring device preventative maintenance and operations plan, review it annually and update as needed.	Plan was submitted and approved in 2013, and last updated in December 2016.
29. Air pollution control practices	Site is implementing good air pollution control practices per the consent decree.
30. Tracking periods of non-operation	Site is keeping written records of startups, shutdowns, malfunctions, non-operation, bypasses per the consent decree.
Section XI – Permits	
31. Incorporate consent decree into new source review and Title V permits	An NSR permit has been issued to the site to incorporate the requirements of this consent decree. The Virginia Department of Environmental Quality reissued the Title V permit in October 2014, incorporating the requirements of the consent decree.
32. Obtain required permits	The site obtained a new source review permit requiring the installation of SCRs on A, B, C, and E Trains. The site also received its new Title V Permit in October 2014.
Section XII – Prohibition of Netting Credits or Offsets from Required Controls	
33. Summary	The site is compliant with the general netting prohibition provisions of the consent decree.
34. General netting prohibition	
35. Exception to general netting prohibition	
36. Outside the scope of the general netting prohibition	

Section XIII – Environmental Mitigation	
37. Operate only Tier III (or equivalent) diesel switcher locomotives	The site is operating only Tier III diesel switcher locomotives.
38. Offset credit prohibition	The site has not sought to obtain netting credits for the purchase and use of the Tier III locomotives.
39. Certification	The site submitted the diesel switcher certification required by the consent decree.

2. Description of Problems Encountered or Anticipated

The site has not encountered or anticipated any problems meeting the requirements of the consent decree.

3. Status of Permit Applications or Modifications

See above description in Section 31.

4. Description of Changes Not Authorized by Permit or Regulation

None

5. Description of Non-compliance with Consent Decree

A review of documents and records associated with the Consent Decree did not indicate any potential violations.